UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re:

BYJU'S ALPHA, INC.,

Debtor.

BYJU'S ALPHA, INC.,

Plaintiff,

GLAS TRUST COMPANY, LLC,

Intervenor-Plaintiff,

v.

CAMSHAFT CAPITAL FUND, LP, CAMSHAFT CAPITAL ADVISORS, LLC, CAMSHAFT CAPITAL MANAGEMENT, LLC, INSPILEARN LLC, and RIJU RAVINDRAN,

Defendants.

Chapter 11

Case No. 24-10140 (BLS)

Adv. Pro. No. 24-50013 (BLS)

MOTION TO RECONSIDER AND AMEND JUDGMENT

Defendants Camshaft Capital Fund, LP, Camshaft Capital Advisors, LLC, Camshaft Capital Management, LLC, and Riju Ravindran (collectively, the "Movants"), by and through their undersigned counsel, respectfully submit this motion (the "Motion"), pursuant to Rule 59(e) of the Federal Rules of Civi Procedure, made applicable by Rule 9023 of the Federal Rules of Bankruptcy Procedure, to reconsider and amend the Judgment Order, dated March 14, 2025 (the "March 14 Judgment") entered in the above adversary proceeding. *See* Adv. Dkt. No. 388. The Movants rely

upon and incorporate herein by reference their memorandum of law in support filed contemporaneously herewith (the "Brief").

For the reasons set forth in the Brief, the Movants respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit A: (i) granting the Motion; (ii) amending the March 14 Judgment by removing the provisions in Paragraphs 2, 3, 4 and 6 relating to damages and pre-judgment interest; (iii) amending the March 14 Judgment by removing Paragraph 7 in its entirety; (iv) scheduling briefing and a hearing on the outstanding issues relating to the March 14 Judgment; and (v) providing such other relief as the Court deems just and proper.

Dated: March 25, 2025

Wilmington, Delaware

KLEIN LLC

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